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BRIAN McKNIGHT

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

BRIAN McKNIGHT, an individual,

Plaintiff,

v.

JACQUELYN WRIGHT, an
individual; and DOES 1 through 10,
inclusive,

Defendants.

Case No.:

COMPLAINT FOR DAMAGES

JURY TRIAL DEMANDED



TO THIS HONORABLE COURT AND ALL INTERESTED PARTIES:

Plaintiff Brian McKnight prosecutes the following claims against Defendants Jacquelyn Wright (also known as Jaguar Wright) and DOES 1-10.

INTRODUCTION

1. This defamation action arises from numerous videos posted on various social media platforms by Defendant Jacquelyn Wright (“Ms. Wright”) under the name Jaguar Wright. In the videos, Ms. Wright claimed that she is the cousin of Plaintiff Brian McKnight’s (“Mr. McKnight”) ex-wife, Ms. Julie McKnight (“Ms. McKnight”). Additionally, Ms. Wright made statements that Mr. McKnight had been abusive to not only prostitutes but to his wife, Ms. Julie McKnight, “...prostitute he had beaten up that my cousin caught him with just before that and how he beat her up for catching him with that chick...,” and that “He was a piece of shit father, and he was an even worse husband.”

THE PARTIES

2. Plaintiff Brian McKnight is an individual and resident of the State of Georgia. For decades, he has been a prominent singer and songwriter in the R&B music industry along with appearing in various television shows and movies.

3. Defendant Jacqueline Wright is an individual and who upon information and belief has in the past year resided in the States of Texas, Nevada, and California. Ms. Wright is a neo-soul singer, songwriter, and content creator. Since December 25, 2022, Ms. Wright has made numerous public statements on various video recordings that falsely implied that Mr. McKnight was abusive to Ms. McKnight during their marriage, was a terrible husband and father, and would pay said prostitutes extra to allow him to physically harm them.



JURISDICTION AND VENUE

4. Jurisdiction is proper pursuant to 28 U.S.C. § 1332 for diversity of citizenship as the parties to this action are citizens of different States. The amount in controversy exceeds \$75,000.00.

5. This Court has jurisdiction over this action under 28 U.S.C. § 1331(b)(2) in that all or a substantial part of the events or omissions giving rise to the claim occurred within this district.

GENERAL ALLEGATIONS

Ms. Wright Verbally Stated in Various Video Recordings That Were Published to Various Social Media Platforms That Mr. McKnight Was Physically Abusive to Ms. McKnight and Others

6. Mr. McKnight's career began when he signed his first record deal with Wing Records and debuted his first album *Brian McKnight* in 1992. Throughout the decades, Mr. McKnight has recorded seventeen (17) studio albums, appeared in approximately eight (8) films, and numerous television shows. Mr. McKnight has numerous hit songs to include but are not limited to *Love Is*, *One Last Cry*, *You Should Be Mine (Don't Waste Your Time)*, and *Back at One*. Mr. McKnight's work has been nominated numerous times throughout the decades and has landed him an award with the NAACP Image Award for Outstanding Male Artist after releasing *Back at One* and an award with Soul Train Music Awards for Best R&B Male Album for his album *Anytime*.

7. Ms. Julie McKnight is a singer and individual who knew and dated Mr. McKnight during their youth.

8. Mr. McKnight was married to Ms. McKnight for thirteen years, from 1990 to 2003.

9. During their marriage two children were born, Brian McKnight Jr. and Niko McKnight.



1 10. During the time Mr. McKnight knew, dated, and then was married to
2 Ms. McKnight, never did Mr. McKnight meet, encounter, or become aware of Ms.
3 Wright and her kinship with Ms. McKnight.

4 11. Upon belief and information, at some point after Mr. McKnight and Ms.
5 McKnight separated, Ms. McKnight shared numerous false and defaming statements
6 with Ms. Wright, who has chosen specific time periods from 2022 through 2024 to
7 spread false and defaming information.

8 12. On or about December 25, 2022, Ms. Wright accessed her Instagram
9 account to produce a live video stream to state false and defaming statements about
10 Mr. McKnight.

11 13. Ms. Wright began her live video by informing those watching the live
12 video, and those who would later view the video, of the music she was listening to
13 and then made the statement "...it's Christmas and I'm giving honesty and truth and
14 gift, ya know as a gift this year..."

15 14. Ms. Wright stated in her live video that "...there's another asshole I
16 need to say Merry Christmas to..." Ms. Wright stated that she came to this conclusion
17 after coming across a video on YouTube that was discussing "...Master P and Brian
18 McKnight and exposing their ungrateful children..." to which, after she discussed
19 Master P, she begun to discuss Mr. McKnight.

20 15. Ms. Wright immediately stated her relationship to Mr. McKnight "...his
21 ex-wife is my cousin, Julie McKnight Johnson, now Julie Johnson." Followed by the
22 statement that Ms. McKnight was the mother of Mr. McKnight's first children and
23 then proceeded to defame and ridicule him as a father, "She's the mother of his oldest
24 children, his first children. He was a piece of shit father, and he was an even worse
25 husband."

26 16. As the live video continued, Ms. Wright claimed to "...know things
27 about Brian that most people do not know..." but failed to acknowledge that she in
28 fact did not know Mr. McKnight.



1 17. Ms. Wright continued the false statements in her live stream video by
2 stating:

3 “...there was a pro in Philly and I’ve spoken about her
4 before. Her name, well she danced by the name Paris. She
5 was dancing at Delilah’s down Spring Garden and
6 Delaware Ave the same time that uh Amber, Amber Rose
7 was when she met Kayne West. Brian was one of my
8 girlfriend from high school’s clients but see the things that
9 most people don’t know is that nigga got a real sick fetish
10 cause he used to pay her extra so that he could choke her
11 out and punch her in her fucking eye. And then he would
12 just sit there and fuck her and beat her and fuck her and
13 beat her. Sometimes I would go and pick her up after calls
14 and I’ll forget the one time I came to pick her up after she
15 had been with Brian and it was just nuts, her eye was all
16 black, lip sitting out, he loosened her tooth...”

17 Ms. Wright knew, or should have known, these statements were false but chose to
18 state them in her public video.

19 18. After Ms. Wright made the false accusation that Mr. McKnight would
20 physically abuse Ms. McKnight and other women, Ms. Wright attempted to support
21 her narrative by stating “...and then we found out later through my friend Jvonne
22 Pearson, who is very very very very good friends with my cousin Julie McKnight
23 Johnson, found out that there was abuse going on in the home.”

24 19. Ms. Wright failed to verify if the statements provided by Mr. Jvonne
25 Pearson (“Mr. Pearson”) were factual prior to sharing them in her live video.

26 20. To further her defamatory statements of Mr. McKnight, Ms. Wright
27 mocked one of Mr. McKnight’s well-known songs, *Back at One*, “Mr. One a
28 nightmare come true, two just want to beat on you, fucker, fuck Brian McKnight...”

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Ms. Wright Continued the False and Defamatory Statements in an Effort to Regain a Positive Image in the Public's Eye

21. During the time span of 2022 through 2024 Ms. Wright experienced not only public backlash for her allegations against other prominent individuals within the music industry but also found herself in legal cases by these individuals.

22. In an effort to continue her narrative and regain the attention of the public for her podcast, on or around May 1, 2024, Ms. Wright released a video on YouTube that further defamed Mr. McKnight as well as brought her false narrative back to the public's attention.

23. During the video, Ms. Wright continued to make the same false and defaming statements regarding Mr. McKnight that she had previously made in her Instagram live video on December 25, 2022.

24. In the video, Ms. Wright begun by discussing the rape by Ike on Tina Turner and then immediately compared it to Mr. McKnight's hit song, *Back at One*.

25. Ms. Wright made the notation that Mr. McKnight's hit song was not inspired by such admiring and loving events that the public believes inspired him, but was inspired by the complete opposite, "...or Brian McKnight going into the studio and recording *one it's like a dream come true* and all what a wonderful great song but if anybody knew about the prostitute he had beaten up that my cousin caught him with just before that and how he beat her up for catching him with that chick and that's where that song came from..."

26. After Ms. Wright made this statement, she realized she had caught the attention of the fellow individuals in the live stream, which was exactly Ms. Wright's intentions.

27. After Ms. Wright noticed that the individuals were now more interested in what she had to say, Ms. Wright took the opportunity to turn Ms. McKnight into a victim and hero "...you know what she did instead, she started advocating for all of



1 his victims. Imagine that you standing in the gap for and getting help for and
2 protecting the women that your husband cheated on you with...”

3 28. Additionally, Ms. Wright furthered her false narrative that Mr.
4 McKnight was abusive when she made the false statement.

5 29. Approximately ten (10) days later on or around May 11, 2024, Ms.
6 Wright participated in an Instagram live stream video with Mr. Jvonne Pearson and
7 two other individuals.

8 30. Ms. Wright took the opportunity to again state her kinship with Ms.
9 McKnight, “...Julie McKnight Johnson is my cousin, she is my family, and I give a
10 damn about what happens to her...”

11 31. Ms. Wright made the statement in an effort to gain the attention of
12 viewers and to inform viewers that she held a relationship with Mr. McKnight, one
13 that she knew, or should have known, was not real.

14 32. Immediately following Ms. Wright’s statement that she is Ms.
15 McKnight’s cousin, Ms. Wright changed her vocal tone to one of disgust and stated
16 “Everything that nigga, McKnight put her through...” In doing so, Ms. Wright had
17 made the effort to keep the attention of the viewers while insinuating through her
18 tone that Mr. McKnight had acted in an unacceptable manner towards Ms. McKnight.

19 33. Again, Ms. Wright took the opportunity to turn Ms. McKnight into a
20 victim and hero while running her narrative that Mr. McKnight was an abusive
21 husband:

22 “...you know it takes a strong woman to be able to get past
23 your husband cheating on you but it’s a whole another kind
24 of animal when you go and save the woman that your
25 husband cheated on you with from that husband. Imagine
26 that you’re sitting there looking at the woman who had sex
with your husband and you’re more concerned about her
wellbeing than your feelings.”

27 34. At this point in the video, Mr. Pearson spoke up about Ms. McKnight’s
28 ability to handle the situation, a situation that had been fabricated by Ms. McKnight,



1 Mr. Pearson, and Ms. Wright to defame Mr. McKnight, “Julie has always been a
2 queen throughout this whole situation” to which Ms. Wright adds “she’s been regal,
3 listen to me, if she had told the family what he was doing, hm, one it’s like a
4 nightmare come true, two we don’t want to fuck with you, three, and it’s so plain to
5 see that you’re the biggest piece of shit, you ass hole...”

6 35. It is evident at this point in the video that Ms. Wright had gained the
7 attention she sought and enjoyed defaming Mr. McKnight by spreading the false
8 statements.

9 36. Before Ms. Wright moved on to discuss and defame other individuals,
10 Ms. Wright again made the effort to spread her false narrative of how Mr. McKnight
11 was inspired for his *Back at One* record, “...how he came up with that record, cause
12 it didn’t start with love, it started with abuse. Don’t let those long songs fool you.
13 Brian McKnight used to mess with a girl who was a professional. Who I went, me
14 and her go back to junior high. He used to pay her extra so he could rough her up.
15 For whatever reason he couldn’t rock it off unless he she had a black eye. That’s who
16 you are Brian.”

17 **Mr. McKnight’s Reputation and Career Suffer as a Result of**
18 **Ms. Wright’s False and Defamatory Statements**

19 37. As a result of Ms. Wright’s false statements that Mr. McKnight was
20 abusive to Ms. McKnight, and other woman, and was a terrible husband and father,
21 Mr. McKnight’s reputation and career sustained immense damage.

22 38. As a singer, songwriter herself, Ms. Wright was well aware of the
23 negative effect that these false and defamatory statements would have on Mr.
24 McKnight’s career.

25 39. Mr. McKnight has endured issues securing venues for concerts, concerts
26 to be cancelled, and petitions for tickets not to be sold through vendors.

27 40. For years, Mr. McKnight has had to endure the false and defaming
28 allegations set out by Ms. Wright. While Mr. McKnight was trying to continue his



1 career, Ms. Wright was pushing a false narrative about him in order to further her
2 career.

3
4 **COUNT ONE – DEFAMATION FOR STATEMENTS IN**
5 **MS. WRIGHT’S MAY 1, 2024, YOUTUBE VIDEO**

6 41. Plaintiff repeats and re-alleges each of the foregoing paragraphs as if set
7 forth fully herein.

8 42. Ms. Wright published a video on YouTube on May 1, 2024. The video,
9 which is still fully assessable, is available to a worldwide audience as the YouTube
10 account is not a private account.

11 43. The video contained false and defamatory statements concerning Mr.
12 McKnight:

- 13 a. “...or Brian McKnight going into the studio and recording *one*
14 *it’s like a dream come true* and all what a wonderful great song
15 but if anybody knew about the prostitute he had beaten up that
16 my cousin caught him with just before that and how he beat her
17 up for catching him with that chick and that’s where that song
18 came from...”
19 b. “...you know what she did instead, she started advocating for all
20 of his victims. Imagine that you standing in the gap for and
21 getting help for and protecting the women that your husband
22 cheated on you with...”

23 44. These statements are of and concerning Mr. McKnight, as he is Ms.
24 McKnight’s former husband, the person who Ms. Wright claims to be the cousin of.
25 Additionally, Ms. Wright blatantly referred to Mr. McKnight in these statements, and
26 those who know Mr. McKnight and/or watched this video knew the person Ms.
27 Wright was speaking about.

28 45. These statements by Ms. Wright, which state that Ms. McKnight and
other women were the victims of abuse, are false:



1 a. Mr. McKnight did not commit abuse against Ms. McKnight or
2 any other woman. Ms. Wright's allegations that Mr. McKnight abused Ms. McKnight
3 and/or any other woman are false and have not been sustained by any evidence.

4 b. Ms. Wright used these false and defaming statements as a motive
5 and means to regain a positive role within the public's eye after making false and
6 defaming statements against other prominent members of the music industry.

7 46. The substantial danger of injury to Mr. McKnight's reputation from Ms.
8 Wright's false statements is readily apparent. Such statements would tend to harm
9 the reputation of another as to lower the individual's reputation within a community
10 and/or to deter third persons from associating or dealing with the individual.

11 47. By making such statements to third parties, Ms. Wright has harmed Mr.
12 McKnight's reputation.

13 48. At the time of recording, Ms. Wright knew, or should have known, the
14 statements were false.

15 49. Ms. Wright's false statements are defamatory *per se* as they insinuate
16 that Mr. McKnight committed a crime involving moral turpitude for which Mr.
17 McKnight, if the charges were true, could be indicted and punished. Additionally,
18 Ms. Wright's false and defamatory statements have prejudiced Mr. McKnight's
19 reputation within the music industry, entitling Mr. McKnight to presumed damages.

20 50. As a direct and proximate result of these false and defamatory
21 statements by Ms. Wright, Mr. McKnight has suffered damages, including, *inter alia*,
22 injury to his reputation, harm to his ability to carry on his profession, embarrassment,
23 humiliation, and emotional distress, in an amount to be determined at trial.

24 51. Ms. Wright's actions were malicious, intentionally and recklessly
25 indifferent to the truth, fraudulent, oppressive, willful, wanton, and evidence of
26 conscious disregard for Mr. McKnight's rights. Mr. McKnight is entitled to punitive
27 damages.
28



COUNT TWO – DEFAMATION FOR STATEMENTS IN
MS. WRIGHT’S MAY 11, 2024, YOUTUBE VIDEO

52. Plaintiff repeats and re-alleges each of the foregoing paragraphs as if set forth fully herein.

53. Ms. Wright published a video on YouTube on May 1, 2024. The video, which is still fully assessable, is available to a worldwide audience as the YouTube account is not a private account.

54. The video contained false and defamatory statements concerning Mr. McKnight:

- a. “...Julie McKnight Johnson is my cousin, she is my family, and I give a damn about what happens to her...”
- b. “Everything that nigga, McKnight put her through...”
- c. “...you know it takes a strong woman to be able to get past your husband cheating on you but it’s a whole another kind of animal when you go and save the woman that your husband cheated on you with from that husband. Imagine that you’re sitting there looking at the woman who had sex with your husband and you’re more concerned about her wellbeing than your feelings.”
- d. “she’s been regal, listen to me, if she had told the family what he was doing, hm, one it’s like a nightmare come true, two we don’t want to fuck with you, three, and it’s so plain to see that you’re the biggest piece of shit, you ass hole...”
- e. “...how he came up with that record, cause it didn’t start with love, it started with abuse. Don’t let those long songs fool you. Brian McKnight used to mess with a girl who was a professional. Who I went, me and her go back to junior high. He used to pay her extra so he could rough her up. For whatever reason he couldn’t rock it off unless he she had a black eye. That’s who you are Brian.”

55. These statements are of and concerning Mr. McKnight, as he is Ms. McKnight’s former husband, the person who Ms. Wright claims to be the cousin of. Additionally, Ms. Wright blatantly referred to Mr. McKnight in these statements, and



1 those who know Mr. McKnight and/or watched this video knew the person Ms.
2 Wright was speaking about.

3 56. These statements by Ms. Wright, which state that Ms. McKnight and
4 other women were the victims of abuse, are false:

5 a. Mr. McKnight did not commit abuse against Ms. McKnight or
6 any other woman. Ms. Wright's allegations that Mr. McKnight abused Ms. McKnight
7 and/or any other woman are false and have not been sustained by any evidence.

8 b. Ms. Wright used these false and defaming statements as a motive
9 and means to regain a positive role within the public's eye after making false and
10 defaming statements against other prominent members of the music industry.

11 57. The substantial danger of injury to Mr. McKnight's reputation from Ms.
12 Wright's false statements is readily apparent. Such statements would tend to harm
13 the reputation of another as to lower the individual's reputation within a community
14 and/or to deter third persons from associating or dealing with the individual.

15 58. By making such statements to third parties, Ms. Wright has harmed Mr.
16 McKnight's reputation.

17 59. At the time of recording, Ms. Wright knew, or should have known, the
18 statements were false.

19 60. Ms. Wright's false statements are defamatory *per se* as they insinuate
20 that Mr. McKnight committed a crime involving moral turpitude for which Mr.
21 McKnight, if the charges were true, could be indicted and punished. Additionally,
22 Ms. Wright's false and defamatory statements have prejudiced Mr. McKnight's
23 reputation within the music industry, entitling Mr. McKnight to presumed damages.

24 61. As a direct and proximate result of these false and defamatory
25 statements by Ms. Wright, Mr. McKnight has suffered damages, including, *inter alia*,
26 injury to his reputation, harm to his ability to carry on his profession, embarrassment,
27 humiliation, and emotional distress, in an amount to be determined at trial.
28



62. Ms. Wright's actions were malicious, intentionally and recklessly indifferent to the truth, fraudulent, oppressive, willful, wanton, and evidence of conscious disregard for Mr. McKnight's rights. Mr. McKnight is entitled to punitive damages.

JURY TRIAL DEMAND

Plaintiff Brian McKnight hereby demands a jury trial on all issues so triable.

PRAYER FOR RELIEF


WHEREFORE, Plaintiff respectfully prays for an award in Plaintiff's favor and against Defendants, as follows:

- (i) For general damages;
- (ii) For special damages;
- (iii) For punitive damages;
- (iv) For prejudgment and post-judgment interest;
- (v) For attorney's fees;
- (vi) For costs of suit; and
- (vii) For such other and further relief as the Court may deem just and proper.

DATED: April 30, 2025

ROSEN ♦ SABA, LLP

By:



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Attorneys for Plaintiff,
BRIAN McKNIGHT

